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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

AXS GROUP LLC,

Plaintiff,

v.

EVENT TICKETS CENTER, INC.,
TICKETNETWORK, INC., VIRTUAL
BARCODE DISTRIBUTION LLC, and
SECURE.TICKETS,

Defendants.

Case No. 2:24-CV-00377-SPG (Ex)

**JOINT MOTION TO DISMISS
CLAIMS AGAINST DEFENDANT
VIRTUAL BARCODE
DISTRIBUTION LLC WITHOUT
PREJUDICE UNDER RULE 41(A)(2)**

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff AXS Group LLC (“AXS”) and Defendant Virtual Barcode Distribution LLC (“VBD”) (collectively, “Parties”) hereby stipulate to the dismissal of VBD from this case. The Parties jointly move the Court to dismiss all of AXS’s claims against VBD without prejudice. The Parties will each bear their own costs and fees.

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1 Dated: June 4, 2025

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23
24 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
25 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
26 content and have authorized this filing.

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2025, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ J. Michael Keyes
J. Michael Keyes, SBN 262281